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**Via ECF Only**

Hon. Nelson S. Román  
United States District Judge, Southern District  
United States Courthouse  
300 Quarropas Street  
White Plains, New York 10601

**Re: *Clear Channel Outdoor, LLC v. City of New Rochelle, et al.***  
**Index No. 7:20-cv-09296-NSR-AEK**  
***Vector Media, LLC v. City of New Rochelle, et al.***  
**Index No. 7:21-cv-00266-NSR-AEK**

Dear Justice Román:

In connection with Defendants' Reply in Support of their Motion for Reconsideration, Defendants have referenced in their Memorandum of Law certain documents from Plaintiff's production upon which Plaintiff has placed various levels of confidentiality designations. Accordingly, we respectfully request leave to file the Reply whereby the specific references to documents so designated by Plaintiff are redacted.

In accordance with the rules of the Court, we are contemporaneously filing a publicly available version of the Reply in redacted form, and a separate entry of the Reply filed under seal with the proposed redactions designated with red highlights.

Respectfully,

HARRIS BEACH PLLC




Darius P. Chafizadeh

DPC:sjm

Defendants' request to redact limited portions of their Reply Memorandum of Law is GRANTED. If, however, the Court determines that the specific information has been withheld in this filing is integral to the Court's ruling on the motion, the Court may reconsider the decision to allow this information to remain redacted. The Clerk of the Court is directed to terminate the motion at ECF No. 196.

**SO ORDERED:**

  
**HON. NELSON S. ROMAN**  
**UNITED STATES DISTRICT JUDGE**

Dated: November 16, 2022  
White Plains, NY